

1 J. RANDALL JONES, Esq., SBN 1927
2 r.jones@kempjones.com
3 MICHAEL J. GAYAN, Esq., SBN 11135
m.gayan@kempjones.com
4 MONA KAVEH, Esq., SBN 11825
m.kaveh@kempjones.com
KEMP JONES LLP
3800 Howard Hughes Parkway, 17th Floor
5 Las Vegas, Nevada 89169
Telephone: +1 702 385 6000

6 DAVID R. SINGER, Esq. (*pro hac vice*)
7 dsinger@jenner.com
AMY M. GALLEGOS, Esq. (*pro hac vice*)
8 agallegos@jenner.com
ALISON I. STEIN, Esq. (*pro hac vice*)
9 astein@jenner.com
ANDREW G. SULLIVAN, Esq. (*pro hac vice*)
10 agsullivan@jenner.com
JENNER & BLOCK LLP
11 515 South Flower Street, Suite 3300
Los Angeles, California 90071
12 Telephone: +1 213 239 5100
Facsimile: +1 213 239 5199

13 RICHARD L. STONE, Esq. (*pro hac vice*)
14 rstone@fastmail.com
850 Devon Avenue
15 Los Angeles, California 90024
Telephone: +1 310 993 2068

16 *Attorneys for Defendants/Counterclaimant*

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

20 LAS VEGAS SUN, INC., a Nevada
21 corporation,

22 Plaintiff,

23 v.

24 SHELDON ADELSON, et al.,

25 Defendants.

26 Case No. 2:19-cv-01667-ART-VCF

27 **JOINT STATUS REPORT PURSUANT TO
ECF NO. 484**

28 **AND RELATED COUNTERCLAIMS**

Pursuant to the Special Master's October 4, 2021 Order re: Protocol for Resolving Discovery Disputes and Deposition Scheduling (ECF No. 484) ("Discovery Protocol"), the Parties hereby submit this Joint Status Report identifying the status of document and deposition discovery:

I. Status of Document Productions

a. Defendants' Production Obligations

On April 4, 2023, Defendants produced documents consistent with continuing obligations under Rule 26(e). On April 4, 2023, and April 14, 2023, Defendants produced documents from their experts consistent with continuing obligations in response to subpoenas served on September 26, 2022, and January 23, 2023.

b. The Plaintiff's Production Obligations

On April 13, 2023, and April 19, 2023, Plaintiff produced documents consistent with continuing obligations under Rule 26(e).

II. Status of Depositions

a. Depositions Taken and Already Scheduled

All fact depositions have been completed, and the following expert depositions have been scheduled or taken as indicated below:¹

Deponents	Deposing Party	Dates
Kordalski, David*	Defendants	February 28, 2023
Rainey, Mark*	Plaintiff	March 9, 2023
Aldrich, Larry*	Defendants	March 15, 2023
Picard, Robert*	Defendants	March 21, 2023
Katz, Michael*	Defendants	April 3, 2023
Gundlach, Greg*	Defendants	April 6, 2023
Nolte, David*	Plaintiff	April 10, 2023
Evans, David*	Plaintiff	April 12, 2023
Gottlieb, Barbara*	Defendants	April 18, 2023
Paulson, Ken*	Plaintiff	April 20, 2023
Lamb, Russell	Defendants	May 10, 2023

¹ Asterisks (*) denote depositions that have already been taken.

1 DATED this 28th day of April 2023.

2 LEWIS ROCA ROTHGERBER CHRISTIE LLP

3 By: *Kristen Martini*

4 E. Leif Reid, Bar No. 5750
5 Kristen L. Martini, Bar No. 11272
6 Nicole Scott, Bar No. 13757
7 Lucy Crow, Bar No. 15203
8 One East Liberty Street, Suite 300
9 Reno, Nevada 89501-2128

10 PISANELLI BICE PLLC
11 James J. Pisanelli, Bar No. 4027
12 Todd L. Bice, Bar No. 4534
13 Jordan T. Smith, Bar No. 12097
14 400 South 7th Street, Suite 300
15 Las Vegas, Nevada 89101

16 ALIOTO LAW FIRM
17 Joseph M. Alioto, *Pro Hac Vice*
18 One Sansome Street, 35th Floor
19 San Francisco, California 94104

20 *Attorneys for Plaintiff/Counterdefendants*

21 DATED this 28th day of April 2023.

22 KEMP JONES LLP

23 By: *Michael J. Gayan*

24 J. Randall Jones, Esq., Bar No. 1927
25 Michael J. Gayan, Esq., Bar No. 11135
26 Mona Kaveh, Esq., Bar No. 11825
27 3800 Howard Hughes Parkway, 17th Fl.
28 Las Vegas, Nevada 89169

29 David R. Singer, Esq., *Pro Hac Vice*
30 Amy M. Gallegos, Esq., *Pro Hac Vice*
31 Alison I. Stein, Esq., *Pro Hac Vice*
32 Andrew G. Sullivan, *Pro Hac Vice*
33 JENNER & BLOCK LLP
34 515 South Flower Street, Suite 3300
35 Los Angeles, California 90071

36 Richard L. Stone, Esq., *Pro Hac Vice*
37 850 Devon Avenue
38 Los Angeles, California 90024

39 *Attorneys for Defendants/
40 Counterclaimant*

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PROOF OF SERVICE

I hereby certify that on the 28th day of April, 2023, I served a true and correct copy of the foregoing **JOINT STATUS REPORT PURSUANT TO ECF NO. 484** via the United States District Court's CM/ECF electronic filing system to all parties on the e-service list.

E. Leif Reid, Bar No. 5750
Kristen L. Martini, Bar No. 11272
Nicole Scott, Bar No. 13757
Lucy Crow, Bar No. 15203
LEWIS ROCA ROTHGERBER CHRISTIE LLP
One East Liberty Street, Suite 300
Reno, Nevada 89501

Joseph M. Alioto, *Pro Hac Vice*
ALIOTO LAW FIRM
One Sansome Street, 35th Floor
San Francisco, California 94104

James J. Pisanelli, Bar No. 4027
Todd L. Bice, Bar No. 4534
Jordan T. Smith, Bar No. 12097
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

Attorneys for Plaintiff/Counterclaim Defendants

/s/ Ali Lott

An employee of Kemp Jones LLP